

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH
CAROLINA**

MAXWELL KADEL, *et al.*,)
)
Plaintiffs,)
)
v.) Case No.: 1:19-cv-272-LCB-LPA
)
DALE FOLWELL, in his official capacity as)
State Treasurer of North Carolina, *et al.*,)
)
Defendants.)
)

**JOINT MOTION FOR ENTRY OF STIPULATION TO CORRECT DEFENDANT
NORTH CAROLINA DEPARTMENT OF PUBLIC SAFETY'S ANSWER**

Defendant State of North Carolina Department of Public Safety (“DPS”) and Plaintiffs Maxwell Kadel, Jason Fleck, Connor Thonen-Fleck, Julia McKeown, Michael D. Bunting, Jr., C.B., by his next friends and parents, Michael D. Bunting, Jr. and Shelley K. Bunting, Sam Silvaine, and Dana Caraway (collectively, “Plaintiffs”) desire to enter into this stipulation (Attachment A) to correct DPS’s Answer (ECF No. 96) and clarify DPS’s position as to the allegations in paragraphs fifteen through seventeen and paragraph 178 of Plaintiffs’ Amended Complaint (ECF No. 75). Correcting this error by stipulation will promote clarity between the parties and conserve judicial and party resources by eliminating the need for Defendant DPS to file an Amended Answer.

Respectfully submitted this the 8th day of July, 2021.

JOSHUA H. STEIN
Attorney General

/s/Alan D. McInnes
Alan D. McInnes
Assistant Attorney General
NC State Bar No. 20938
amcinnes@ncdps.gov

NC Department of Justice
PO Box 629
Raleigh, NC 27602
Tel: 919.716.6920
Fax: 919.716.6764

Counsel for Defendant North Carolina Department of Public Safety

/s/ Amy E. Richardson

Amy E. Richardson
N.C. State Bar No. 28768
Lauren E. Snyder
N.C. State Bar No. 54150
HARRIS, WILTSHERE & GRANNIS LLP
1033 Wade Avenue, Suite 100
Raleigh, NC 27605-1155
Telephone: 919-429-7386
Facsimile: 202-730-1301
arichardson@hwglaw.com

Deepika H. Ravi*
HARRIS, WILTSHERE & GRANNIS LLP
1919 M Street N.W., 8th Floor,
Washington, D.C. 20036
Telephone: 202-730-1300
Facsimile: 202-730-1301
dravi@hwglaw.com

David Brown*
Alejandra Caraballo*
Noah E. Lewis*
**TRANSGENDER LEGAL
DEFENSE AND
EDUCATION FUND, INC.**
520 8th Ave, Ste. 2204
New York, NY 10018
Telephone: 646-993-1680
Facsimile: 646-993-1686
dbrown@transgenderlegal.org

Tara Borelli*
**LAMBDA LEGAL DEFENSE AND
EDUCATION FUND, INC.**
730 Peachtree Street NE, Suite 640
Atlanta, GA 30318-1210
Telephone: 404-897-1880
Facsimile: 404-897-1884
tborelli@lambdalegal.org

Omar Gonzalez-Pagan*
**LAMBDA LEGAL DEFENSE AND
EDUCATION FUND, INC.**
120 Wall Street, 19th Floor
New York, NY 10005
Telephone: 212-809-8585
Facsimile: 212-809-0055
ogonzalez-pagan@lambdalegal.org

Counsel for Plaintiffs

*Appearing by special appearance
pursuant to L.R. 83.1(d).

CERTIFICATE OF SERVICE

The undersigned hereby certifies that this document was filed through the CM/ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

This, the 8th day of July, 2021.

/s/Amy E. Richardson
Amy E. Richardson
Counsel for Plaintiffs